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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Parts 73 and 74)
of the Commission's Rules to)
Permit Unattended Operation)
of Broadcast Stations and to)
Update Broadcast Station)
Transmitter Control and)
Monitoring Requirements)

MM Docket No. 94-130

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To: The Commission

COMMENTS OF SILVER KING COMMUNICATIONS, INC.

Silver King Communications, Inc. ["Silver King"], ultimate parent of the licensees of twelve television stations,^{1/} submits herewith its comments concerning the Commission's proposal to allow unattended operation of broadcast stations.

In its Notice of Proposed Rulemaking, FCC 94-289 (December 7, 1994), the Commission seeks comment on permitting unattended broadcast station operation and relaxing associated station control and monitoring requirements. If adopted, these rules would ease requirements for staffing, particularly during overnight hours and for duopolized stations or satellite/repeater operations. Silver King therefore supports the FCC's proposal as offering

^{1/} The Silver King stations are the following: WHSE-TV, Newark, New Jersey; WHSI-TV, Smithtown, New York; WHSW-TV, Baltimore, Maryland; WHSH-TV, Marlborough, Massachusetts; WQHS-TV, Cleveland, Ohio; WHSP-TV, Vineland, New Jersey; WEHS-TV, Aurora, Illinois; KHSX-TV, Irving, Texas; KHSI-TV, Alvin, Texas; WBHS-TV, Tampa, Florida; KHSC-TV, Ontario, California; and WYHS-TV, Hollywood, Florida.

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significant potential for broadcast stations to reduce unnecessary costs and eliminate burdensome operating requirements. In support thereof, Silver King offers the following.

Silver King and its predecessor have owned and operated television stations since 1986. At that time, each television station was monitored 24 hours daily to ensure that its transmitter operating parameters were measured and logged accurately and that its programming was broadcast and logged as aired. In addition, each station had to deal with operating issues relating to employee security, tower light monitoring, emergency broadcast system activations and signal quality control.

Over the last nine years, Silver King has systematically developed hardware and software solutions to each of these four mentioned concerns. More particularly, Silver King has developed a system of remote control operation (utilizing personal computers, remote control units and software at each of its stations) that will enable its engineers at a central location to simultaneously monitor each Silver King station. Silver King has also developed efficient and reliable master control automation systems at each of its stations as well as a transmitter remote control system with capability to monitor and respond to the activation of emergency broadcasting system, tower lights, building security and fire prevention. Silver King has developed and has continued to refine these systems with currently available technology and, in the process, has improved its stations' technical operation while simplifying their monitoring needs.

Consistent with Silver King's efforts in this area, it supports the Commission's proposals to allow unattended operation of a television station transmitter, but only if the following conditions are satisfied:

- The station must have an "on-call" engineer available in the event that the station's transmitter is out of tolerance in a manner that is not correctable from a remote control location.
- The station must have automated EBS equipment or a suitable substitute that will enable the station to respond to activation of the EBS system in a timely manner.
- The station must provide for appropriate security for the station's transmitter, tower and other associated transmission software.
- The station must have the ability to monitor its tower lights continuously 24 hours a day.

If these conditions can be met (and they must be for purposes of maintaining the integrity of the broadcasting system and preserving public safety), then the Commission's proposal should be adopted, as it will benefit both licensees and, ultimately, the public.

Silver King has been a responsible leader in utilizing technological developments and improving station operation while reducing regulatory and manpower burdens. Silver King views the Commission's current proposal as a logical continuation of the efforts that Silver King has made to date under current rules and regulations.

Silver King urges the Commission to take action in a responsible deregulatory manner. Silver King agrees that television stations should be permitted to take operational advantage of ongoing developments in technology so long as station operational integrity is not compromised. Adoption of the proposal concerning unattended operation would permit them to do so.

Respectfully submitted,

SILVER KING COMMUNICATIONS, INC.

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